

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN G. PITTS, individually, and on behalf
of all others similarly situated,

Plaintiff,

-against-

NEW YORK CITY TAXI AND LIMOSINE COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE, VERIFONE INC.,
VERIFONE TRANSPORTATION SYSTEMS, INC., d/b/a
TAXITRONIC, MOBILE KNOWLEDGE CORP. d/b/a CREATIVE
MOBILE TECHNOLOGIES, LLC, DIGITAL DISPATCH, LTD.,
AND TAXI TECHNOLOGY CORP.

Defendants.
-----X

**MOTION TO ADMIT
COUNSEL PRO HAC
VICE**

08 cv 01280
(MM)

PURSUANT TO RULE 1.(c) of the Local Rules of the United States District Court for the
Southern District of New York, I, JEFFREY A. MANHEIMER, ESQ., a member in good standing
of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of

Applicant's Name: James Randall Pitts, Jr.
Firm Name: Bradford Pitts, L.L.C.
Address: 1130 22nd Street South, Suite 4500
City, State, Zip: Birmingham, AL 35205
Phone Number: (205) 939-4300
Fax Number: (205) 877-7330
Email Address: jrp@southlawllc.com

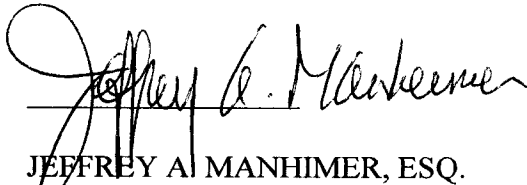
James Randall Pitts, Jr. is a member in good standing of the Bar of the State of Alabama. There are
no pending disciplinary proceedings against James Randall Pitts, Jr. in any State or Federal Court.

DATED: New York, New York
February 10, 2008

MAR 06 2008

10752133-5226
OK

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeffrey A. Manheimer", written over a horizontal line.

JEFFREY A. MANHIMER, ESQ.

JM 7067

747 Third Avenue, 37th Floor

New York, NY 10017

212-752-4500

(Fax) 212-752-5253

jmanheimer@jmanheimerlaw.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN G. PITTS, Individually, and on behalf of
All others similarly situated,

Plaintiff,

-against-

NEW YORK CITY TAXI AND LIMOSINE COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE, VERIFONE INC.,
VERIFONE TRANSPORTATION SYSTEMS, INC., d/b/a
TAXITRONIC, MOBILE KNOWLEDGE CORP. d/b/a CREATIVE
MOBILE TECHNOLOGIES, LLC, DIGITAL DISPATCH, LTD.,
AND TAXI TECHNOLOGY CORP.

Defendants.
-----X

State of New York)
County of New York)

**AFFIDAVIT OF
JEFFREY A.
MANHEIMER, ESQ. IN
SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

08 cv 01280 (MM)

Jeffrey A. Manheimer, Esq., being duly sworn, deposes and says as follows:

1. I am an attorney with the law firm of Jeffrey A. Manheimer, Esq. counsel for the Plaintiffs in the above captioned action and I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of the Plaintiffs' motion to admit James Randall Pitts, Jr. as counsel pro hac vice to also represent the Plaintiffs' in this action.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law before the Courts of the State of New York in 1975. I am also admitted to the bars of the United States District Court for the Eastern and Southern Districts of New York, and, I am in good standing with those District Courts.
3. I have known James Randall Pitts, Jr. since November 2007.
4. Mr. Pitts is a partner with Bradford Pitts, L.L.C., in Birmingham, Alabama and a member of the Bar of the State of Alabama, County of Montgomery as evidenced by the certificate annexed herewith as Exhibit "A".
5. I have found from my discussions and review of the facts of this matter that Mr. Pitts is a skilled attorney and a person of integrity. In our review of the facts of this case and the

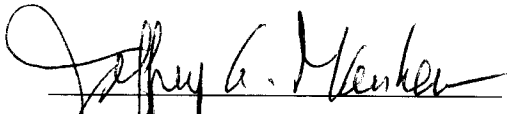
applicable law I have found him to be experienced in Federal Practice and the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of James Randall Pitts, Jr., pro hac vice.
7. I respectfully submit herewith a proposed Order granting the admission of James Randall Pitts, Jr., pro hac vice, which is attached hereto as Exhibit "A".

WHEREFORE, it is respectfully requested that the motion to admit James Randall Pitts, Jr., pro hac vice, to represent the Plaintiffs' in the above captioned matter be granted.

Dated: New York, NY

February 5, 2008


JEFFREY A. MANHEIMER, ESQ.

Sworn to Before Me This

11 Day of Feb 2008


NOTARY PUBLIC

ROBERT A. SESTI
NOTARY PUBLIC, State of New York
No. 4972280
Qualified in Westchester County
Commission Expires Sept. 24, 2010

JEFFREY A. MANHIMER, ESQ.

JM (7067)

747 Third Avenue, 37th Floor

New York, NY 10017

212-752-4500

(Fax) 212-752-5253

jmanheimer@jmanheimerlaw.com

**ALABAMA STATE BAR**

415 Dexter Avenue • Post Office Box 671 • Montgomery, Alabama 36101
Telephone: 334/269-1515 • Fax: 334/261-6310
www.alabar.org

STATE OF ALABAMA**COUNTY OF MONTGOMERY**

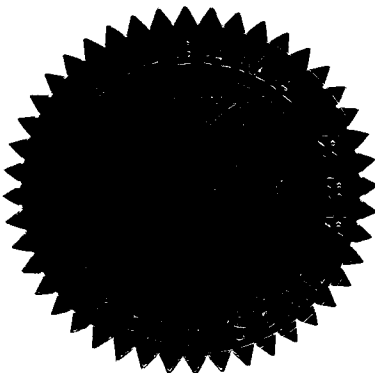
I, Keith B. Norman, Secretary of the Alabama State Bar and custodian of its records, hereby certify that James Randall Pitts Jr. has been duly admitted to the Bar of this State and is entitled to practice in all of the courts of this State including the Supreme Court of Alabama, which is the highest court of said state.

I further certify that James Randall Pitts Jr. was admitted to the Alabama State Bar April 2, 2003.

I further certify that the said James Randall Pitts Jr. is presently a member in good standing of the Alabama State Bar, having met all licensing/dues requirements for the year ending September 30, 2008.

IN WITNESS WHEREOF, I have hereunto set my hand and the seal of the Alabama State Bar on this the 11th day of February, 2008.

Keith B. Norman, Secretary



LAWYERS RENDER SERVICE

1JAM93903 - JEFFREY A. MANHEIMER, ESQ.

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS, ETC,

PLAINTIFF

- vs. -

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,DEFENDANT

Index No: 08CV01280

Date Filed: / /

Office No:

Court Date:

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

DAVID GOLDBERG being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/22/2008 at 12:51PM at 40 RECTOR STREET - 5TH FL , NEW YORK, NY 10006, I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon NEW YORK CITY TAXI AND LIMOUSINE COMMISSION the DEFENDANT therein named by delivering to, and leaving personally with JOHN BOLES, AUTHORIZED TO ACCEPT, a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: MALE

COLOR: BLACK

HAIR: BALD

APP. AGE: 45

APP. HT: 5'6

APP. WT: 200

OTHER IDENTIFYING FEATURES:

Sworn to before me on 02/25/2008.

NEIL SIMENSKY

Notary Public, State of New York

No. 01SI4767841

Qualified in NEW YORK

Commission Expires 12/31/2010

DAVID GOLDBERG - 916033

SID MARKS NY, INC.

20 VESEY ST., ROOM 1110

NEW YORK, NY 10007

AP

1JAM93899 - JEFFREY A. MANHEIMER, ESQ.

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS, ETC,

PLAINTIFF

- vs. -

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,DEFENDANT

Index No: 08CV01280

Date Filed: / /

Office No:

Court Date:

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

DAVID GOLDBERG being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/22/2008 at 12:19PM at 100 CHURCH STREET - 4TH FL , NEW YORK, NY , I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon CITY OF NEW YORK the DEFENDANT therein named by delivering to, and leaving personally with TAMEKA MENDEZ GAMMON, AUTHORIZED TO ACCEPT, a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: FEMALE

COLOR: BLACK

HAIR: BLACK

APP. AGE: 35

APP. HT: 5'4

APP. WT: 120

OTHER IDENTIFYING FEATURES:

Sworn to before me on 02/25/2008.

NEIL SIMENSKY
Notary Public, State of New York
No. 01SI4767841
Qualified in NEW YORK
Commission Expires 12/31/2010DAVID GOLDBERG - 916033
SID MARKS NY, INC.
20 VESEY ST., ROOM 1110
NEW YORK, NY 10007
AP

1JAM93897 - JEFFREY A. MANHEIMER, ESQ.

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS, ETC,

PLAINTIFF

- vs. -

Index No: 08CV01280

Date Filed: / /

Office No:

Court Date:

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,DEFENDANT

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

BYRON ROBUSKY being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/25/2008 at 2:27PM at 37 EAST 28TH STREET 6TH FLR, NEW YORK, NY 10016, I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon TAXI WORKERS ALLIANCE the DEFENDANT therein named by delivering to, and leaving personally with WILLIAM LINDAUER, MANAGING AGENT, a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: MALE

COLOR: WHITE

HAIR: BROWN

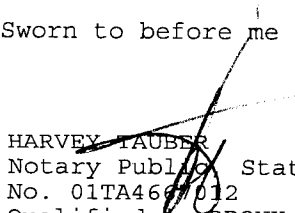
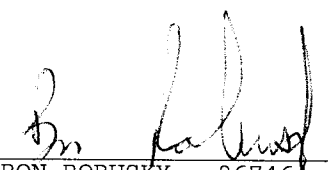
APP. AGE: 45

APP. HT: 5'5

APP. WT: 165

OTHER IDENTIFYING FEATURES: GLASSES

Sworn to before me on 02/27/2008.


HARVEY TAUBER
Notary Public, State of New York
No. 01TA4667012
Qualified in BRONX
Commission Expires 12/31/2010
BYRON ROBUSKY - 867464
SID MARKS NY, INC.
20 VESEY ST., ROOM 1110
NEW YORK, NY 10007
ER

1JAM93892 - JEFFREY A. MANHEIMER, ESQ.

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS, ETC,

PLAINTIFF

- VS. -

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,DEFENDANT

Index No: 08CV01280

Date Filed: / /

Office No:

Court Date:

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

BYRON ROBUSKY being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/25/2008 at 2:12PM at 875 AVENUE OF THE AMERICAS Suite 501 % National Registered Agents Inc., NEW YORK, NY 10001, I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon VERIFONE, INC. a domestic corporation (one of) the DEFENDANT therein named by delivering to, and leaving personally with MARIA JARCIA, MANAGING AGENT a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: FEMALE

COLOR: BROWN

HAIR: BROWN

APP. AGE: 45

APP. HT: 5'4

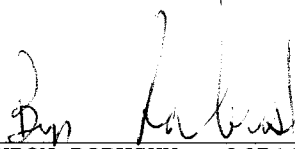
APP. WT: 140

OTHER IDENTIFYING FEATURES:

Deponent further says: That at the time of such service I knew the said corporation so served as aforesaid to be the same corporation mentioned and described in the aforementioned document(s) as (one of) the DEFENDANT in this action.

Sworn to before me on 02/27/2008.

HARVEY TAUBER
Notary Public, State of New York
No. 01TA4647012
Qualified in BRONX
Commission Expires 12/31/2010


BYRON ROBUSKY - 867464
SID MARKS NY, INC.
20 VESEY ST., ROOM 1110
NEW YORK, NY 10007
ER

1JAM93893 - JEFFREY A. MANHEIMER, ESQ.

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS, ETC,

PLAINTIFF

- vs. -

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,DEFENDANT

Index No: 08CV01280

Date Filed: / /

Office No:

Court Date:

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

BYRON ROBUSKY being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/25/2008 at 2:12PM at 875 AVENUE OF THE AMERICAS Suite 501 % National Registered Agents Inc., NEW YORK, NY 10001, I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon VERIFONE TRANSPORTATION SYSTEMS INC DBA TAXITRONIC the DEFENDANT therein named by delivering to, and leaving personally with MARIA JARCIA, MANAGING AGENT, a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: FEMALE

COLOR: BROWN

HAIR: BROWN

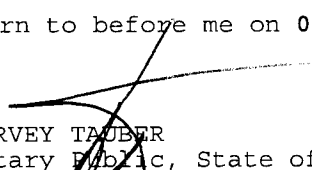
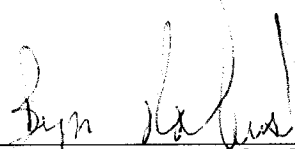
APP. AGE: 45

APP. HT: 5'4

APP. WT: 140

OTHER IDENTIFYING FEATURES:

Sworn to before me on 02/27/2008.


HARVEY TAUBER
Notary Public, State of New York
No. 0174467012
Qualified in BRONX
Commission Expires 12/31/2010
BYRON ROBUSKY - 867464
SID MARKS NY, INC.
20 VESEY ST., ROOM 1110
NEW YORK, NY 10007
ER

UNITED DISTRICT SOUTHERN DISTRICT COURT - NEW YORK COUNTY

SUSAN G. PITTS ETC,

PLAINTIFF

- vs. -

NEW YORK CITY TAXI AND LIMOUSINE
COMMISSION, CITY
OF NEW YORK, TAXI WORKERS ALLIANCE,

DEFENDANT

Index No: 08 CV 01280
Date Filed: / /
Office No:
Court Date:

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

DANIEL KNIGHT being duly sworn, deposes and says;

I am over the age of 18 years, not a party to this action, and reside in the State of New York.

That on 02/26/2008 at 4:10PM at 25 ROCKWOOD PLACE , ENGLEWOOD, NJ 07631, I served a true copy of the MOTION TO ADMIT COUNSEL PRO HAC VICE & ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION upon TAXI TECHNOLOGY CORP a domestic corporation (one of) the DEFENDANT therein named by delivering to, and leaving personally with JAE CHOI, MANAGING AGENT a true copy of each thereof.

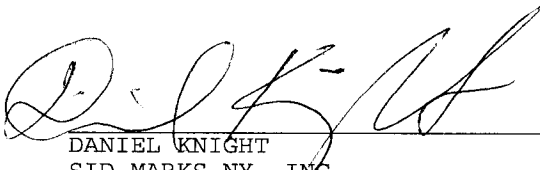
Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of service as follows:

SEX: MALE	COLOR: YELLOW	HAIR: BLACK
APP. AGE: 36	APP. HT: 5'6	APP. WT: 160
OTHER IDENTIFYING FEATURES:		

Deponent further says: That at the time of such service I knew the said corporation so served as aforesaid to be the same corporation mentioned and described in the aforementioned document(s) as (one of) the DEFENDANT in this action.

Sworn to before me on 03/04/2008.

NEIL SIMENSKY
Notary Public, State of New York
No. 01SI4767841
Qualified in NEW YORK
Commission Expires 12/31/2010


DANIEL KNIGHT
SID MARKS NY, INC.
20 VESEY ST., ROOM 1110
NEW YORK, NY 10007
AP

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN G. PITTS, Individually, and on
Behalf of all others similarly situated,

Plaintiff,

-against-

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

08 cv 01280 (MM)

NEW YORK CITY TAXI AND LIMOSINE
COMMISSION, CITY OF NEW YORK,
TAXI WORKERS ALLIANCE, VERIFONE INC.,
VERIFONE TRANSPORTATION SYSTEMS, INC.,
d/b/a TAXITRONIC, MOBILE KNOWLEDGE
CORP. d/b/a CREATIVE MOBILE
TECHNOLOGIES, LLC, DIGITAL DISPATCH,
LTD., AND TAXI TECHNOLOGY CORP.

Defendants.

-----X
Upon the motion of JEFFREY A. MANHEIMER, ESQ., attorney for Susan G. Pitts, et. al.

and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: James Randall Pitts, Jr.
Firm Name: Bradford Pitts, L.L.C.
Address: 1130 22nd Street South, Suite 4500
City, State, Zip: Birmingham, AL 35205
Phone Number: (205) 939-4300
Fax Number: (205) 877-7330
Email Address: jrp@southlawllc.com

Is admitted to practice pro hac vice as co-counsel for Susan G. Pitts, et. al. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) System, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2008

New York, NY

United States District/Magistrate Judge

FOR

OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT #

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
08 cv 01280 (MM)

SUSAN G. PITTS, Individually, and on behalf of all others similarly situated,

Plaintiff,

-against-

NEW YORK CITY TAXI AND LIMOSINE COMMISSION, CITY OF NEW YORK, TAXI
WORKERS ALLIANCE, VERIFONE INC., VERIFONE TRANSPORTATION SYSTEMS, INC.,
d/b/a TAXITRONIC, MOBILE KNOWLEDGE CORP. d/b/a CREATIVE MOBILE
TECHNOLOGIES, LLC, DIGITAL DISPATCH, LTD., AND TAXI TECHNOLOGY CORP.

Defendants.

MOTION TO ADMIT COUNSEL PRO HAC VICE

JEFFREY A. MANHEIMER, ESQ. (7067)
Attorneys for Plaintiff
Office and Post Office Address, Telephone
747 Third Avenue – 37th Floor
New York, NY 10017
(212) 752-4500

To

Service of a copy of the
within is hereby admitted.

Dated: _____ 19__

Attorneys for

PLEASE TAKE NOTICE:

____ NOTICE OF ENTRY that the within is a (certified) true copy of a duly entered in the
office of the clerk of the within named
court on 19

____ NOTICE OF SETTLEMENT
presented that an order of which the within is a true copy will be
for settlement to the HON.
one of the judges of the within named Court,
at

on 19 at M
Dated:

Yours, etc.

JEFFREY A. MANHEIMER, ESQ. (7067)